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ORIGINAL
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November 25, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Stop Code - 1170
Washington, D.C. 20554

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FCC - MAIL ROOM

Re: MM Docket No. 87-268

Dear Ms. Searcy:

Transmitted herewith, is an original and four copies of Joint Comments of Group W Television, Inc., The Hearst Corporation and WGBH Educational Foundation in the above-captioned docket.

If any questions should arise during the course of your consideration of these comments, it is respectfully requested that you communicate with this office.

Very truly yours,

THARRINGTON, SMITH & HARGROVE

Mark J. Prak
Counsel to
The Hearst Corporation

MJP/mt
Enclosures

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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C.

ORIGINAL
FILE

In the Matter of

Advanced Television Systems
and Their Impact Upon the
Existing Television Broadcast
Service

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MM Docket No. 87-268

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To: The Commission

FCC - MAIL ROOM

**JOINT COMMENTS OF
GROUP W TELEVISION, INC.,
THE HEARST CORPORATION, AND
WGBH EDUCATIONAL FOUNDATION**

The above-captioned organizations are the licensees of WBZ-TV, WCVB-TV, WGBH-TV, and WGBX-TV, all of which are licensed to Boston, Massachusetts, and all of which operate from the same tower in Needham, Massachusetts.

In preparing for the advent of Advanced Television (ATV), the three licensees have conducted engineering studies, based on available data, to establish how they might add ATV facilities to the existing tower without adversely affecting their NTSC operations or exceeding the structural capability of the tower. Toward this end, the three licensees have retained electrical and structural engineering counsel and have solicited proposals from broadcast equipment manufacturers.

Assuming that the available guidelines are correct, the three licensees have concluded that it will be possible to accommodate four NTSC and four ATV facilities

on the existing tower, but only under certain conditions, one of which is that the UHF facilities employ 8-3/16" rigid transmission line. Such line cannot be used above Channel 56.

The structure in question is part of Boston "Site 1," and the channels listed in the proposed Table of Allotments for this site include four that are among those for which 8-3/16" line is acceptable. Thus, if this group of channels were part of the final table, the three licensees could expect to be able to implement their tentative plans. On the other hand, absent the availability of such channels, the three licensees might be precluded from continuing their colocation at the present site. It is believed to be an axiom that colocation of television facilities benefits the involved stations, the viewing public, and aviation community, and the environment.

On this basis, and independent of any other Comments that any of the three licensees may submit in this proceeding, it is requested that the Commission assure that in its final Table of [ATV] Allotments there are at least four allotments at or below Channel 56 at Boston Site 1 that may be used by these three licensees.

It would appear that licensees in other television markets around the country may encounter circumstances analogous to those discussed above. Accordingly, the joint commenters urge that the Commission consider and analyze the prospects for colocation of facilities in all markets.

This the 25th day of November, 1992.

GROUP W TELEVISION, INC.

By 
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Its Attorney

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